

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

Shawn C. Northrup

Case No. 3:12-CV-1544

Plaintiff,

REPORT OF PARTIES'  
PLANNING MEETING

-vs-

JUDGE: Jeffrey J. Helmick

City of Toledo, et al.

Defendant.

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on  
, and was attended by:

Daniel T. Ellis Counsel for Plaintiff(s)

John T. Madigan Counsel for Defendant(s)

2. The parties:  
XX Have exchanged the pre-discovery disclosures required by Rule 26(a)(1) and the Court's prior  
order; or

       Will exchange such disclosures by

3. The parties recommend the following track:

       Expedited        Standard XX Complex

       Administrative        Mass Tort

4. This case XX is /        is not suitable for one or more of the following Alternative  
Dispute Resolution ("ADR") mechanisms:

       Early Neutral Evaluation XX Mediation        Arbitration

       Summary Jury Trial        Summary Bench Trial

5. The parties       do/ XXdo not consent to the jurisdiction of the United States  
Magistrate Judge pursuant to 28 U.S.C. 636(c).

If you are consenting to the jurisdiction of the United States Magistrate Judge, please contact the Judge's Chambers (419-213-5690) prior to the Case Management Conference. A Consent to the Exercise of Jurisdiction will then be issued for signature by all parties and the case will be sent to the Magistrate Judge for the Case Management Conference and all further proceedings.

6. The parties agree that this case \_\_\_\_\_ does / XX does not involve electronic discovery.

7. Recommended Discovery Plan (Counsel are reminded to review the default standard for e-discovery set forth in Appendix K to the Local Rules):

(a) Describe the subjects on which discovery is to be sought, the nature and extent of discovery and any potential problems: Policies and Procedures of Toledo Police Dept.; Name and Addresses of Witnesses; Training Materials of TPD; Dash Cams; 911 Audio; Statements made by defendants; Employment Records; tape recordings

(b) Describe anticipated e-discovery issues (i.e., what ESI is available and where it resides; ease/difficulty and cost of producing information; schedule and format of production; preservation of information; agreements about privilege or work-production protection, etc.):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(c) Describe handling of expert discovery (i.e., timetable for disclosure of names and exchange of reports, depositions): Disclosure of Experts, March 1, 2013 Plaintiff April 1, 2013 Defendants; Depositions before July 31, 2013

\_\_\_\_\_

(d) Discovery Deadlines:

(i)	Liability:	<u>May 1, 2013</u>
(ii)	Damages:	<u>May 1, 2013</u>

8. Recommended dispositive motion date: June 30, 2013

9. Recommended cut-off for amending the pleadings and/or adding additional parties:

January 30, 2013

10. Recommended date for status hearing and/or final pretrial settlement conference:

January 1, 2013 (Status Hearing)

11. Other matters for the attention of the Court: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Daniel T. Ellis Attorney for Plaintiff(s): s/ Daniel T. Ellis

John T. Madigan Attorney for Defendant(s): s/ John T. Madigan